

FOUNDING PARTNERS RONALD C. HUNT RAYMOND L. HAMLIN

TERRY RIDLEY 1956-2012

ASSOCIATE COUNSEL SHIRLEY MORENO EMEKA MADUBUOGO

## THE LAW FIRM OF **HUNT, HAMLIN & RIDLEY**

**COUNSELLORS ATLAW** 

NEWARK OFFICE MILITARY PARK BUILDING 60 PARK PLACE, 16<sup>TH</sup> FLOOR NEWARK, NJ 07102

PATERSON OFFICE 418 GRAND STREET PATERSON, NJ 07505

OF COUNSEL VIELKA VELAZQUEZ NOELLE VAN BAAREN ISAAC WRIGHT

**‡ALSO ADMITTEDIN NY** 

ALL REPLIES TO THE NEWARK OFFICE

TEL: (973) 242-4471 TELEFAX:(973) 242-8295 E-MAIL: emeka.madubuogo@HuntHamlinRidley.com WEB SITE: www.HuntHamlinRidley.com

August 2, 2021

## VIA ECOURTS:

Hon. Susan D. Wigenton, U.S.M.J United State District Court, District of New Jersey 50 Walnut Street, RM 4015 Newark, New Jersey 07102

United States v. Samora Patterson Crim. No. 2:20-cr-494-SDW

Dear Judge Wigenton,

As you know, this law firm represents Mr. Samora Patterson the ("Defendant") in the above-referenced matter. This letter is written on behalf of the Defendant who respectfully requests an adjustment to his current conditions and pre-trial release, specifically the Defendant request a curfew from Monday to Sunday. The Court authorizes satellite tracking outside of his residence to track his movements so the Court may grant the curfew.

We believe that under certain circumstance, this Court should would be able to monitor the Defendant's conditional release and curfew, and reasonably assure the appearance of the Defendant as required and the safety of any other persons in the community. The Defendant has been on house arrest since 2019, while he awaits the pending matter in this case. Since being placed on electric monitoring, the Defendant believes he has been compliant considering the long-standing term of his home confinement.

The Defendant has been subjected to home confinement for several years, and should be permitted a lesser restrictive condition, which includes a curfew. We recognize that Mr. Paterson, in the past has violated the conditions release, however we submit the length of the home confinement though preferable than to incarnation has often caused Mr. Patterson severe problems under his current terms. Looking at this case, the Defendant does not pose any threat to the citizens of New Jersey, nor the public at large. He is currently on electric monitoring, has two children, and all his immediate family are in the state of New Jersey. The Defendant wholeheartedly intends to fight the charges against him. Therefore, he is not a flight risk under these circumstances.

Specifically, the curfew hours would be approved by pretrial services and GPS technology, and the Defendant will full comply with any conditions the Court and all parties involve see fit. Hence the Defendant, hereby assures and agrees, not to:

- 1. Commit any further crimes while outside the home;
- 2. Not to use or possess any illegal narcotics;
- 3. Not to leave the state without prior consent;
- 4. Not to associate with criminals;
- 5. Not to tamper with the electric monitoring device;
- 6. Not to remove, damage, or compromise the electric monitoring device;
- 7. Deceive, lie, or defraud the courts, supervisors, and the State regarding his location;
- 8. Stay out past his curfew;
- 9. Injure or harm another person;
- 10. Assist anyone in the commission of a crime; or
- 11. Obstruct justice, or tamper with any evidence.

In addition, prior to the filing of this letter, the undersigned attorney communicated with AUSA, Sean Sherman, Esq., and Pretrial services, and both parties' consent to the curfew, as long as Mr. Patterson agrees to follow the term provided by Pretrial services and Court Order. Hence, all parties involved consent and agree.

Therefore, we ask this Court to grant the Defendant's application to modify his pretrial release and permit a curfew with location monitoring and GPS tracking.

HUNT, HAMLIN & RIDLEY
Attorney for Defendant

RONALD C. HUNT /S/ RONALD C. HUNT, ESQ. Ronald C. Hunt, Esq.
Attorney I.D. Number: 011281985
Hunt, Hamlin & Ridley
Military Park Building
60 Park Place, 16th Floor
Newark, NJ 07102
(973) 242-4471 - Phone
(973) 242-8295 - Fax

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,: CRIMINAL DOCKET

:

Plaintiffs, : Case No. 2:20-cr-494-SDW

VS.

Attorney for Defendant

Samora Patterson

: ORDER PERMITTING LESSOR RESTRICTIONS

: AND AN ASSIGNED CURFEW FOR THE

SAMORA PATTERSON : DEFENDANT

:

Defendant.

THIS MATTER, having been opened to the Court, after obtaining consent from all Parties involved, the application of Ronald C. Hunt, Esquire, of the Law Offices of Hunt, Hamlin & Ridley, Esquires, attorneys for the Defendant, SAMORA PATTERSON, to be assigned a curfew Monday to Sunday, from a reasonable time deemed appropriate by pretrial services, the Defendant will continue to be electronically monitored, and with good cause having been shown;

IT IS on this \_\_\_\_\_ day of August, 2021;

ORDERED, that Mr. Patterson is granted a curfew, and is allowed to leave home confinement, Monday to Sunday, starting, on August \_\_\_\_\_, 2021, where he will continue to be monitored electronically with GPS technology, 24 hours of the day,

- IT IS FURTHER ORDERED that the Defendant's location monitoring conditions shall be modified to location monitoring with a curfew, hours approved by pretrial services and gps technology.
- IT IS FURTHER ORDERED that the Defendant hereby assures and agrees, not to:
  - 1. Commit any further crimes while outside the home;
  - 2. Not to use or possess any illegal narcotics;
  - 3. Not to leave the state without prior consent;
  - 4. Not to associate with criminals;
  - 5. Not to tamper with the electric monitoring device;
  - 6. Not to remove, damage, or compromise the electric monitoring device;
  - 7. Deceive, lie, or defraud the courts, his supervisors, and the State regarding his location;
  - 8. Stay out past his curfew;
  - 9. Injure or harm another person;
  - 10. Assist anyone in the commission of a crime; or
  - 11. Obstruct justice, or tamper with any evidence.

In the event the Defendant does violate any of these conditions, the Defendant may be remanded back to State custody. A copy of this order shall be deemed served upon all Counsel ECF.

Hon. Susan D. Wigenton, U.S.M.J

Opposed	
Unopposed	